<center>**REMARKS**</center>

This response is submitted in response to an Office Action mailed on December 28, 2007. Claims 1-31 were pending at the time the Office Action was issued. Applicant hereby amends Claims 1, 6, 19-20, and 26-27. Claims 1-31 remain pending.

<center>**I.   REJECTIONS UNDER 35 U.S.C. § 102**</center>

Claims 1-6, 10-11, 13, 15-21, 25-26, and 28-31 were rejected under 35 U.S.C. § 102(b) as having been anticipated by U.S. Patent 6,279,029 to Sampat *et al.* (hereinafter "Sampat"). Respectfully, Applicant traverses the rejection, and submit that the claims are allowable over the reference cited to Sampat for at least the reasons explained in detail below.

<u>Claims 1-6, 10-11, 13 and 28-31</u>

Claims 2-6, 10-11, 13, and 28-31 depend from Claim 1. Claim 1, as amended, recites:

> 1. A system comprising:
>> one or more computer-readable media, the one or more computer-readable media including:
>> a presentation that includes media content, the media content comprising at least one of audio content and video content;
>> a media engine to obtain input information from the media content, the input information including a descriptor and media type information;
>> a destination object to receive the input information from the media engine, the destination object further selectively associates the input information with one or more output presentation descriptors, and to provide the one

or more output presentation descriptors to the media engine; and

an application to provide the presentation to an output target, the application further configured to dynamically create the media engine and the destination object,

wherein the media engine is further configured to setup at least one transform and obtain at least one media sink based on the one or more output presentation descriptors to process the presentation for output to the output target.

Applicant respectfully traverses the rejection. First, Sampat does not recite, "a *destination object* to receive the input information from the media engine, the destination object further associates the input information with one or more output presentation descriptors, and to provide the one or more output presentation descriptors *to the media engine*," as recited in Claim 1. (Emphasis added).

Instead, Sampat discloses a MSM (Media Service Manager) 1608 that "recognizes the available source and sink MSPs and is responsible for initializing and configuring the MSPs for the defined channels." (Column 9, Lines 10-12). Even assuming, *in arguendo*, that the MSM 1608 is equivalent to a destination object, Sampat does not teach or suggest that is MSM 1608 is capable of providing "output descriptors" *back* to a "media engine" from which it received "input information," as recited in Claim 1.

In other words, the act of initialization and configuration of MSPs based on an "available source," as disclosed by Sampat, is a one way process. This one way process is different from receiving input information from a source (media engine) and providing "output presentation descriptors" *back* to the same source (media engine).

Second, Sampat does not recite, "an application to provide the presentation to an output target, the application further configured to *dynamically* create the

media engine and obtain the destination object," as claimed in Claim 1. (Emphasis added). Instead, Sampat discloses a "server application 1602 of server software architecture 1512 allows an administrator of multicast system 100 to define the configuration and destination of channels." (Column 8, Lines 46-58; Column 11, Lines 49-53). The definition "of the configuration and destination of channels" does not teach the setup of a media engine that is capable of obtaining "input information from the media content," as claimed in Claim 1.

Moreover, the definition and configuration of channels by an "administrator" of a multicast system 100 indicates intervention by an outside human actor during the definition process. In contrast, Claim 1 recites an application that is configured *to dynamically* create the media engine and obtain the destination object.

Accordingly, for at least the reasons stated above, Sampat fails to anticipate Claim 1. Moreover, since Claims 2-6, 10-11, and 13 depend from Claim 1, they are at least allowable due to their dependency, as well as due to additional limitations recited.

Claims 15-21 and 25-26

Claims 16-21 and 25-26 depend from Claim 15. Claim 15 recites:

15.   A method for use by an application in presenting a presentation, the method comprising:
         selectively providing input information describing media content to be presented in the presentation to a destination object in response to an operation by a media engine;
         selectively associating the input information with output information using the destination object, the output information enabling the transformation of the presentation for output to an output target; and

> providing output information from the destination object to the media engine,
>
> wherein the media engine provides the presentation to the output target without requiring further interaction with the application by selectively obtaining at least one transform and setting up at least one media sink based on the output information.

Applicant respectfully traverses the rejection. First, Sampat does not teach or suggest, "providing output information from the *destination object to the media engine*," as recited in Claim 15. (Emphasis added).

In rejecting this element, the Office Action asserts that "the MSM is both the destination object and the media engine." (Office Action, Page 7, Lines 9-10). A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). MPEP 2131. However, Sampat does not disclose that its MSM 1608 includes another component. Accordingly, Sampat does not recite, either expressly or inherently, a "destination object" as claim in Claim 15. Moreover, if, *in arguendo,* the MSM 1608 is both the destination object and the media engine, then Sampat cannot anticipate "providing output information from the *destination object to the media engine*," as Sampat does not teach or suggest that MSM 1608 passes data to itself.

Accordingly, for at least the reasons stated above, Sampat fails to anticipate Claim 15. Moreover, since Claims 16-21, 25-26, and 28-31 depend from Claim 15, they are at least allowable due to their dependency, as well as due to additional limitations recited.

Specifically, Claim 19 is further allowable over Sampat. Claim 19, as amended, recites:

19. The method of claim 15, wherein selectively associating the input information with output information includes associating an input media stream with a presentation output media stream to be presented in the presentation.

Sampat does not teach or suggest "associating an *input* media stream with a presentation *output* media stream to be presented in the presentation." (emphasis added). Instead, Sampat disclose a server application 1602 that relates "data streams" together as channels. (Column 8, Lines 46-60). However, Sampat does not teach or suggest that its "data streams" include "input" data streams and "output" data streams, or that the "input" data streams may be associated with the "output" data streams. Accordingly, Claim 19 is further allowable over Sampat.

II.   REJECTIONS UNDER 35 U.S.C. § 103

Claims 7-9 and 22-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sampat in view of the U.S. Patent 6,321,252 to Bhola *et al.* (hereinafter "Bhola").

Claims 7-9

Claims 7-9 depend from Claim 1. Claim 1, as amended, recites:

1. A system comprising:
    one or more computer-readable media, the one or more computer-readable media including:
    a presentation that includes media content, the media content comprising at least one of audio content and video content;
    a media engine to obtain input information from the media content, the input information including a descriptor and media type information;
    a destination object to receive the input information from the media engine, the destination object further selectively associates the input information with one or more output

> presentation descriptors, and to provide the one
> or more output presentation descriptors to the
> media engine; and
>
> an application to provide the presentation to an
> output target, the application further configured
> to dynamically create the media engine and the
> destination object,
>
> wherein the media engine is further configured to
> setup at least one transform and obtain at least
> one media sink based on the one or more output
> presentation descriptors to process the
> presentation for output to the output target.

Applicant respectfully traverses the rejection. First, Applicant incorporates the reasoning presented above in response to the rejection of Claim 1 under 35 U.S.C. § 102(b). Accordingly, Applicant submits that Sampat does not teach or disclose the system as recited in Claim 1. (emphasis added).

Second, the deficiencies of Sampat, relative to the rejected claims, are not remedied by Bhola. Instead, Bhola discloses the creation of an event stream and the replication of an event stream, and a clock object that includes a source-clock object 250 and a sink-clock object 260. (Column 3, Lines 35-67; Column 6, Lines 6-57; Column 7, Lines 14-35). However, Bhola does not teach or suggest, as recited in Claim 1:

> a *destination object* to receive the input information from
> the media engine, the destination object further
> *associates* the *input information* with *one or more*
> *output presentation descriptors*, and to provide the one
> or more output presentation descriptors *to the media*
> *engine;*
>
> an application to provide the presentation to an output
> target, the application further configured to
> *dynamically* create the media engine and the
> destination object. (Emphasis added).

Accordingly, the cited references to Sampat and Bhola, whether individually or in combination, do not teach or suggest the system recited in Claim 1. Further, since Claims 7-9 depend from Claim 1, they are also allowable over the

cited references at least due to their dependency, as well as due to additional limitations recited.

<u>Claims 22-24</u>

Claims 22-24 depend from Claim 15. Claim 15, as amended, recites:

> 15.   A method for use by an application in presenting a presentation, the method comprising:
>
> selectively providing input information describing media content to be presented in the presentation to a destination object in response to an operation by a media engine;
>
> selectively associating the input information with output information using the destination object, the output information enabling the transformation of the presentation for output to an output target; and
>
> providing output information from the destination object to the media engine,
>
> wherein the media engine provides the presentation to the output target without requiring further interaction with the application by selectively obtaining at least one transform and setting up at least one media sink based on the output information.

Applicant respectfully traverses the rejection. First, Applicant incorporates the argument present above in response to the rejection of Claim 15 under 35 U.S.C. § 102(b) by analogy. Accordingly, Applicant submits that Sampat does not recite the method claimed in Claim 15.

Second, the deficiencies of Sampat are not remedied by Bhola. Instead, Bhola discloses the creation of an event stream and the replication of an event stream, and a clock object that includes a source-clock object 250 and a sink-clock object 260. (Column 3, Lines 35-67; Column 6, Lines 6-57; Column 7, Lines 14-35). However, Bhola does not teach or suggest, "providing output information from the destination object to the media engine," as claimed in Claim 15.

Accordingly, the cited references to Sampat and Bhola, whether individually or in combination, do not disclose, teach or fairly suggest the method recited in Claim 15. Further, since Claims 22-24 depend from Claim 15, they are also allowable over the cited references at least due to their dependency, as well as due to additional limitations recited.

Claim 12

Claim 12 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sampat in view of U.S. Patent 6,694,368 to An *et al.* (hereinafter "An"). Claim 12 depends from Claim 1. Applicant respectfully traverses the rejection. First, Applicant incorporates the argument present above in response to the rejection of Claim 1 under 35 U.S.C. § 102(b) by analogy. Accordingly, Applicant submits that Sampat does not recite the method claimed in Claim 1.

Second, the deficiencies of Sampat are not remedied by An. Instead, An discloses a stream interface 13 that includes three sub-properties, these sub-properties includes a stream bus 17, a stream Quality of Service (QoS) semantic 18, and a stream direction 19. (Column 8, Lines 15-19). Further, the stream bus property 17 describes a stream bus interface standard that includes a media type, a media format, etc. (Column 8, Lines 20-25). However, An does not teach or suggest, as recited in Claim 1:

> a *destination object* to receive the input information from the media engine, the destination object further *associates* the *input information* with *one or more output presentation descriptors,* and to provide the one or more output presentation descriptors *to the media engine;*
> an application to provide the presentation to an output target, the application further configured to

> *dynamically* create the media engine and the
> destination object. (Emphasis added).

Accordingly, the cited references to Sampat and An, whether individually or in combination, do not disclose, teach or fairly suggest the method recited in Claim 1. Further, since Claim 12 depends from Claim 1, it is also allowable over the cited references at least due to its dependency, as well as due to additional limitations recited.

Claim 27

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sampat in view of An. Claim 27 depends from Claim 15. Applicant respectfully traverses the rejection. First, Applicant incorporates the argument present above in response to the rejection of Claim 15 under 35 U.S.C. § 102(b) by analogy. Accordingly, Applicant submits that Sampat does not recite the method claimed in Claim 15.

Second, the deficiencies of Sampat are not remedied by An. Instead, An discloses a stream interface 13 that includes three sub-properties, the sub-properties include a stream bus 17, a stream Quality of Service (QoS) semantic 18, and a stream direction 19. (Column 8, Lines 15-19). Further, the stream bus property 17 describes a stream bus interface standard that includes a media type, a media format, etc. (Column 8, Lines 20-25). However, An does not teach or suggest, "providing output information from the destination object to the media engine," as claimed in Claim 15.

Accordingly, the cited references to Sampat and An, whether individually or in combination, do not disclose, teach or fairly suggest the method recited in

Claim 15. Further, since Claim 27 depends from Claim 15, it is also allowable over the cited references at least due to its dependency, as well as due to additional limitations recited.

Claim 14

Claim 14 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sampat in view of U.S. Patent Publication 2004/0073912 to Meza *et al.* (hereinafter "Meza"). Claim 14 depends from Claim 1. Applicant respectfully traverses the rejection. First, Applicant respectfully incorporates the argument present above in response to the rejection of Claim 1 under 35 U.S.C. § 102(b) by analogy. Accordingly, Applicant submits that Sampat does not recite the method claimed in Claim 1.

Second, the deficiencies of Sampat are not remedied by Meza. Instead, Meza discloses a software server 322(b) that delivers presentation data in a predetermined order. (Paragraph 122, Lines 4-7). However, Meza does not teach or suggest, as recited in Claim 1:

> a *destination object* to receive the input information from the media engine, the destination object further *associates* the *input information* with *one or more output presentation descriptors*, and to provide the one or more output presentation descriptors *to the media engine;*
> an application to provide the presentation to an output target, the application further configured to *dynamically* create the media engine and the destination object. (Emphasis added).

Accordingly, the cited references to Sampat and Meza, whether individually or in combination, do not disclose, teach or fairly suggest the method recited in Claim 1. Further, since Claim 14 depends from Claim 1, it is also

allowable over the cited references at least due to its dependency, as well as due to additional limitations recited.

In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

CONCLUSION

For the foregoing reasons, Applicant respectfully submits that Claims 1-31 are now in condition for allowance. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Respectfully Submitted,

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